

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
(MARSHALL DIVISION)**

TACTUS TECHNOLOGIES, LLC, <p style="text-align: center;">Plaintiff,</p> <p>v.</p> <p>SAMSUNG ELECTRONICS CO., LTD.; and SAMSUNG ELECTRONICS AMERICA, INC.,</p> <p style="text-align: center;">Defendants.</p>	§ § § § § § § § § §	<p style="text-align: center;">C.A. No. 2:20-CV-00035</p> <p style="text-align: center;">JURY TRIAL DEMANDED</p>
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**JOINT MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE
PLEAD IN RESPONSE TO PLAINTIFF’S COMPLAINT AND WAIVER
OF FOREIGN SERVICE REQUIREMENT**

Plaintiff Tactus Technologies, LLC (“TACTUS”) and Defendants Samsung Electronics Co., LTD and Samsung Electronics America, Inc. (“SAMSUNG”) jointly move the Court to extend the time within which Defendants are required to answer or otherwise respond to TACTUS’s Complaint in this action by 90 days, which would make the deadline June 4, 2020. TACTUS and SAMSUNG agreed that SAMSUNG ELECTRONICS CO., LTD, which is a foreign corporation located outside the United States, waives the service of process requirements under Federal Rule of Civil Procedure 4(h) and 4(f)(1) and will not challenge service in exchange for the 90-day extension. Such a waiver and extension are made pursuant to Federal Rule of Civil Procedure 4(d)(3), which grants foreign defendants 90 days to answer in exchange for waiving service.

Accordingly, the parties request that the Court grant the request for a 90-day extension for the Defendants to answer. The parties do not make this motion for purposes of delay, but for good cause such that the Court is not burdened with a procedural dispute.

Dated: February 27, 2020

Respectfully submitted,

/s/ Jonathan H. Rastegar

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 27th day of February, 2020.

/s/ Jonathan H. Rastegar